

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Nebraska

United States of America
v.

Case No.

4:18MJ3172

ALEC RAMSEY EILAND

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 3, 2018 in the county of LANCASTER in the
District of NEBRASKA, the defendant(s) violated:

Code Section

18 U.S.C. 2261A(2)
18 U.S.C. 875

Offense Description

CYBERSTALKING
TRANSMITTING THREATENING COMMUNICATIONS

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT JOHN D. HALLOCK.

☒ Continued on the attached sheet.



Complainant's signature

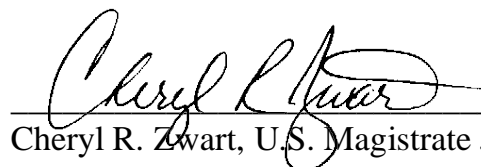
JOHN D. HALLOCK, SPECIAL AGENT

Printed name and title

Sworn to before me by reliable electronic means:

Date: November 9, 2018.

District of Nebraska


Cheryl R. Zwart, U.S. Magistrate Judge

**AFFIDAVIT IN SUPPORT OF CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, John D. Hallock, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have been so employed for approximately seventeen (17) years. I am currently assigned to the FBI Omaha Division, Violent Crimes Squad, Great Plains Violent Crime Task Force (GPVCTF) where I am responsible for investigating violations of various criminal statutes, including those pertaining to Cyberstalking, in violation of Title 18, United States Code, Section 2261A(2) and Transmitting Threatening Communications, in violation of Title 18, United States Code, Section 875. I have been the Case Agent and have assisted in Federal Stalking and Threatening Communications investigations, which have resulted in search warrants, arrests, and the seizure of forfeiture and assets. Prior to joining the FBI, I served in the United States Air Force (USAF), both active duty and National Guard for 8 ½ years, and then served as a police officer for seven years.

2. I have received relevant training in violent crime and Cyberstalking and Threatening Communication investigations from the FBI Academy in Quantico, Virginia. I have also acquired knowledge and information about the means and methods of Cyberstalking and Threatening Communications, to include informal training, other law enforcement officers and investigators, informants, persons whom I have arrested and/or interviewed, and my participation in multiple investigations related to Cyberstalking and Threatening Communications investigations. The aforementioned investigations ultimately led to the arrests and convictions of

those persons who violated those federal crimes.

PURPOSE OF THIS AFFIDAVIT

3. This affidavit is submitted in support of a criminal complaint and arrest warrant for ALEC RAMSEY EILAND, a white male, born in 1999. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not set forth each and every fact known to me regarding this investigation. The statements contained in this affidavit are based in part on the investigation that I have conducted and information provided to me by other law enforcement officers verbally, and through written reports.

4. Because of the sensitive circumstances relating to the information provided herein, and to protect the three victims which are mentioned throughout the affidavit, your affiant will refer to the following:

i. An adult female with the initials LG, whom I refer to throughout the affidavit as V1 for "Victim #1."

ii. An adult female with the initials CD, whom I will refer to throughout the affidavit as V2 for "Victim # 2."

iii. An adult female with the initials EG, whom I refer to throughout the affidavit as V3 for "Victim # 3."

iv. An adult male with the initials PG, who is the biological father of V3, and the Uncle of V1.

OVERVIEW OF INVESTIGATION

5. On November 6, 2018, the FBI Omaha Division received a telephonic complaint in where the complainant reported that a female victim was receiving numerous threats across

the internet from a white male subsequently identified as ALEC RAMSEY EILAND. These threats, which were posted on various social media sites, involved threats of bodily harm such as rape, and other threats such as posting the victims on social media sites for purposes of attempting to use the victims for prostitution.

6. On November 7, 2018, at approximately 9:00 a.m., your affiant met with PG, V1, and V3 in Omaha, Nebraska for purposes of an interview. Your affiant first met with PG (who is the biological father of V3 and the Uncle of V1) who explained that V1, V2, and V3 were the victims of Cyberstalking and Threatening Communications via the internet. PG explained that he had been saving the social media posts that were created by EILAND, and had taken over the accounts of V3 on November 3, 2018 in order to protect V3 from the stalking and threatening communications. PG also explained that V1 had been receiving threatening communications from EILAND, and the communications had been coming from various social media sites and from random profiles, which PG, V1 and V3 believed were all created by EILAND. PG provided your affiant with copies of the communications for both V1 and V3. For the purpose of establishing probable cause in reference to the federal violations charged, below are a sample of the communications received by V1 and V3:

i. V1 "Snapchat" post – "There's a special fucking place in hell for cunts like you who don't give a shit about people's life's and how you effect them honestly you can fucking die for all I care I'm not even sad about you anymore more pissed than anything."

ii. V1 "Facebook mobile application" post – listed as "Johhny Velsey shared a photo." In this post, a picture of V1 is provided and the text reads "call or text me at (a phone number is provided) for a good time – I will make all your dreams come true in all formats thru

sext, photos, or videos. If you really want and it's not far away I will even have sex with you for as less as \$50 and if I like you I might do it for free. I'm down to have three ways and make any of your fantasies come true! Just text me or call me and say hey babe ready for a good time or something like that just tell me what your into kinks and all and I will send you a video or text from there! Can't wait to see all the handsome studs who want this fine piece of ass!"

iii. V3 "Instagram" post – listed as gallentineemma – "This is just the start!!!! There's so much more to come!!! I hope your ready to live a living nightmare!!!! Like I said before you can thank your slut cousins girlfriend for all of this!!!!"

iv. V3 "Facebook "Instagram" post – listed as gallentinemma with a photo of V1 and V3 – Want to see photos of both of us!!!! Want to exchange photos!!!! And my girlfriend on snap!!!!"

v. V1 "Facebook messenger" post – listed as jermany8 – "I can't wait to rape that fine ass of yours!!!! I'm going to cum so hard all over you!!!! Remember this is your girlfriend fault, she could have saved you but she didn't truly love you!!!! The only way out of not being raped is killing yourself slut!!!!"

vi. V1 "Facebook messenger" post – listed as johnnybravo7 – "Hey slut!!!! Did you like those flat tires!!!! That's just the start next is s bomb attached your engine!!!! Then after you blow up it's your sisters car next!!!! You better kill yourself before it's too late!!!! Thank your whore girlfriend for all of this!!!!"

7. On November 7, 2018, your affiant interviewed V1 in Omaha, Nebraska. V1 explained that V2 is the partner of V1, and V1 and V2 reside in Lincoln, Nebraska. V1 stated that V1 had become friends with EILAND approximately one year ago when they worked

together in Lincoln, Nebraska. V1 stated that V1 would socialize with EILAND outside of their employment, and V1 stated that EILAND eventually asked V1 out. V1 explained to EILAND that V1 was dating V2, and that V1 wanted to remain friends with EILAND. V1 stated that EILAND initially agreed to be friends with V1, but then changed his mind, as EILAND told V1 that he could not be V1'S friend because it hurt too much.

8. V1 stated that in September 2018, on EILAND'S birthday, V1 stated that V1 and EILAND were doing "Facetime" on the computer, and EILAND was saying that he "wanted to fuck us so hard" in where EILAND was referring to V1 and V2. V1 stated that EILAND attempted to stab his roommate, as V1 witnessed it during the Facetime conversation. Shortly after the incident, V1 said that EILAND started to text V1 that EILAND was going to kill himself. V1 stated that EILAND continued to harass V1 nonstop through the use of social media. V1 stated that V1 had also filed a complaint at the business where V1 and EILAND worked together, and EILAND was subsequently transferred to another location.

9. V1 stated that EILAND started to drive by V1'S residence, and that V1 was getting a voluminous amount of messages and threats from EILAND. V1 stated that V2 was also receiving the messages, and that EILAND was irate that V1 and V2 were involved in a romantic relationship. V1 stated that V1 became very scared of EILAND, and decided to shut down all of V1'S social media accounts. V1 stated that V2 kept V2'S social media accounts, but recently deleted the accounts, as V2 was receiving the same type of communications from EILAND.

10. On November 7, 2018, Task Force Officer (TFO) Anthony Sattlefield, assigned to the FBI Omaha Division GPVCTF, interviewed V3 in Omaha, Nebraska. TFO Sattlefield

reported that V3, on November 3, 2018, began to receive harassing and threatening messages from EILAND. TFO Sattlefield reported that V3 had met EILAND at V1'S graduation party in May 2017, and this was the only time she had met EILAND. V3 told TFO Sattlefield that she was really upset and scared when she received the messages, as the messages contained references to watching V3 and possibly contacting other family members of V3.

11. On November 17, 2018, your affiant, FBI Agent SA Brandon Day of the FBI Omaha Division, Lincoln, Nebraska Resident Agency (LRA), FBI Agent SA Jonathan Robitaille, and TFO Sattlefield made contact with EILAND in the parking lot of his apartment complex in Lincoln, Nebraska, as he was walking to his vehicle. Your affiant explained to EILAND that investigators wanted to talk to EILAND about the incidents involving the above-mentioned victims. Before EILAND was interviewed, your affiant explained to EILAND that the interview would be recorded, and that your affiant would be reading EILAND an Advice of Rights Form, advising EILAND of his Miranda rights. After reading the Advice of Rights Form to EILAND, he was afforded the opportunity to read over the form. EILAND indicated that he wanted to a lawyer before he answered any questions. The interview was then terminated.

12. A few moments after terminating the interview, EILAND told your affiant that he wanted to talk. Your affiant reactivated the audio recorder and read EILAND an Advice of Rights Form for a second time. EILAND was then afforded the opportunity to read over the form. EILAND, after reading over the form, signed the form, waiving his Miranda rights, as EILAND stated that he wanted to talk to investigators about the above-mentioned information.

13. EILAND admitted that he was responsible for the threatening communications. EILAND stated that he made up the fake accounts that he was using to send the communications

to the victims, and could not remember all of the fake accounts he created. EILAND stated that he was destroyed mentally as he and V1 were best friends. EILAND stated that after he was transferred by his employer, he attempted suicide, and was admitted to the Bryan West Hospital in Lincoln, Nebraska. EILAND stated that he loved V1 more than anybody, and that his relationship was totally plutonic with V1.

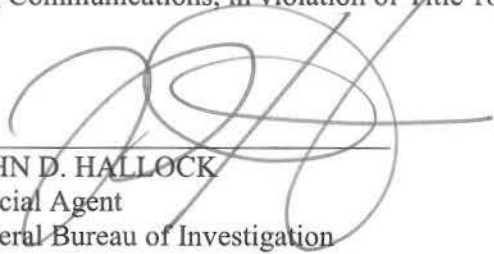
14. EILAND stated that he posted a "Snapchat" story that contained threats, and called it a "venting technique." EILAND stated that he did not mean the things that he posted on social media. EILAND stated that he became angrier and thought that he needed to get revenge. EILAND admitted to creating the fake social media accounts that he used to send the communications. EILAND stated that he was upset with V2, so he sent threatening posts to V2 as well.

15. EILAND admitted that he also sent posts to V3. EILAND admitted to sending nude photos of adult men to the victims in where the adult men had full erections in the photos. EILAND admitted to making up the posts in where the victims could be contacted for sexual favors. EILAND stated that he regretted what he did, and that he was not going to hurt anyone. EILAND stated that he suffers from Severe Anxiety Disorder and Severe Depression.

16. In my training and experience, messages that are transmitted via Internet web sites and applications like Facebook, which EILAND used to send threatening messages, are facilities of interstate commerce and the messages must travel in interstate commerce to reach a victim. Facebook servers as a matter of public record are maintained in North Carolina, Sweden, and Iowa. The defendant also transmitted threatening text messages by means of cellular telephone, and cellular telephones are also facilities of interstate commerce in my

training and experience.

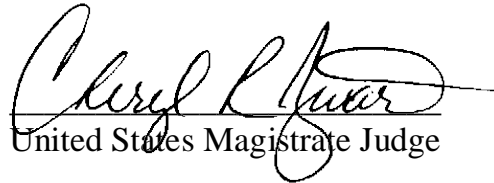
17. Based upon the above facts and circumstances, I believe sufficient probable cause exists to authorize a criminal complaint and arrest warrant for ALEC RAMSEY EILAND regarding the violations pertaining to Cyberstalking, in violation of Title 18, United States Code, Section 2261A(2) and Transmitting Threatening Communications, in violation of Title 18, United States Code, Section 875.



JOHN D. HALLOCK
Special Agent
Federal Bureau of Investigation

Sworn to before me by reliable electronic means:

Dated: November 9, 2018.



United States Magistrate Judge